

MEMO ENDORSED



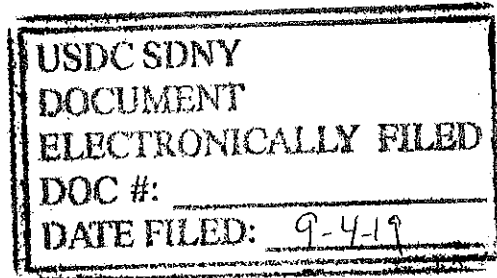
180 MAIDEN LANE, 6th FLOOR, NEW YORK, NY 10038
info@spi-pc.com | T: (646) 787-9880 | F: (646) 787-9886

SAM P. ISRAEL
FOUNDER & MANAGING PARTNER

Eleonora Zlotnikova
Timothy Foster
Timothy Savitsky
David Hrovat
Associates

BY ECF

Hon. John F. Keenan
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312



September 3, 2019

Re: King v. Wang et. al. No. 14-cv-07694 (JFK-JLC)

Dear Judge Keenan,

We write on behalf of Yien-Koo King ("Yien-Koo" or Plaintiff") to request an extension of the expert report deadline, currently set for September 13, 2019, and of all other attendant deadlines by 28 days. *See* ECF Dkt. No. 184 (Order scheduling expert discovery and motions deadlines). Counsel for the Defendants, after consulting with their clients, have agreed to consent to the revised expert discovery schedule should the Court grant it.

The Plaintiff's retained expert is now approximately midway through conducting his valuations of the 98 classical Chinese paintings alleged in the Amended Complaint to have been self-dealt by the Defendants. However, in view of the large number of items which must be reviewed, the complexity of the analysis, and the need for thoroughness given the enormous value of the paintings (which is well into the tens of millions of dollars range), the Plaintiff's expert has advised us that he will not be able to finalize his report until October 11th.

Therefore, and with the Defendants' consent, we respectfully request that the scheduled deadlines in this matter be revised as follows:

- i. Parties to exchange any affirmative expert reports by October 11, 2019 (extended from September 13th);
- ii. Parties to exchange any rebuttal expert reports by November 29, 2019 (extended from October 31st);
- iii. Expert depositions to be completed by December 27, 2019 (extended from November 29th); and

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- iv. Parties to file for summary judgment by January 17, 2020
(extended from December 20, 2019).

We assure Your Honor that the parties are moving with all deliberate speed to meet the deadlines scheduled by the Court. Our request for an extension is necessitated by the scope of our expert's undertaking and we respectfully submit that it is proportional to the needs of this multi-million-dollar suit.¹

Respectfully submitted:

Sam P. Israel, P. C.

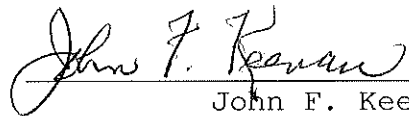
By: /s/Sam P. Israel
Sam Israel (SPI 0270)

cc. All counsel of record [via ECF]

Both parties consenting, Plaintiff's request for extension of discovery dates is GRANTED. Accordingly, parties shall exchange affirmative expert reports by October 11, 2019; parties shall exchange rebuttal expert reports by November 29, 2019; expert depositions shall be completed by December 27, 2019; and parties shall file motions for summary judgment by January 17, 2020.

SO ORDERED.

Dated: New York, New York
September 4, 2019



John F. Keenan

United States District Judge

¹ As a further update, the parties have scheduled mediation of this and all related litigation for September 27, 2019.